

# **EXHIBIT G**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOURNEY NEWELL, individually and on behalf  
of a class of all persons and entities similarly  
situated,

Plaintiff

vs.

LENDVIA, LLC  
Defendant.

Case No. 25-1018-GJP

**DECLARATION OF JENNIFER CABRERA IN SUPPORT OF  
DEFENDANT LENDVIA LLC'S MOTION TO COMPEL ARBITRATION**

I, Jenniffer Cabrera, declare as follows:

1. I am an attorney duly licensed to practice law in the state of Florida, and am employed by the firm Troutman Amin, LLP, the attorney of record for LendVia, LLC. in the above-entitled action.
2. The following facts are within my own personal knowledge and if called as a witness to testify in this matter I would testify to the same.
3. On June 5, 2025, this Court ordered the parties to conduct limited discovery concerning the validity and enforceability of the purported arbitration agreement by June 26, 2025. ECF 25.
4. On June 26, 2025, the parties exchanged discovery responses and production of documents via email.
5. LendVia's document production to Plaintiff's discovery demands was labeled as LendVia001-017.

6. LendVia's document production included a Verified Consent Certificate which was automatically generated at the time of Plaintiff's submission. *See Exhibit A – Verified Consent.*
7. The Certificate includes a 43-second video replay showing Plaintiff completing several form fields on <https://upfinances.com/apply>, including loan amount, loan purpose, email address, phone number, first and last name, social security number, and date of birth.
8. The live link of the Verified Consent Certificate was emailed to Plaintiff's counsel on June 26, 2025. LendVia is willing to provide a copy to the Court under seal given that the video discloses Plaintiff's social security number.
9. LendVia's document production included the Terms of Use for the website <https://upfinances.com/apply>. *See Exhibit B – Website's Term of Use.*

I declare under penalty of perjury that the foregoing is true and correct under the laws of the state of Florida.

Signed under the penalties of perjury this 24<sup>th</sup> day of July, 2025.

Respectfully submitted,

By: /S/ Jenniffer Cabrera  
Jenniffer Cabrera